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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND [PROPOSED]
ORDER CONTINUING DEADLINES FOR
EXPERT DISCOVERY AND CLASS
CERTIFICATION**

Judge: Honorable Yvonne Gonzalez Rogers

1 Pursuant to Civil Local Rules 6-2 and 7-12, this joint stipulation is entered into between
2 Plaintiffs and Defendant Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, Google seeks a modest extension of time to file an Answer to Plaintiffs’ Third
4 Amended Complaint—from April 1, 2022 to April 8, 2022;

5 WHEREAS, the Parties agree that Plaintiffs should have an opportunity to review Google’s
6 Answer prior to the deadline for submitting opening expert reports;

7 WHEREAS, the Parties agree that Plaintiffs should have an opportunity to review all
8 productions in response to Search 2 of the Special Master process prior to the deadline for submitting
9 opening expert reports;

10 WHEREAS, Google has committed to completing all productions in response to Search 2
11 of the Special Master process by April 8, 2022;

12 WHEREAS, the Parties have agreed to extend by two weeks each of the deadlines for opening
13 expert reports and rebuttal expert reports;

14 WHEREAS, the Parties wish to have more flexibility for scheduling expert depositions, and
15 therefore seek to extend the close of expert discovery in this case;

16 WHEREAS, the Parties have agreed to a protocol to govern scheduling expert depositions,
17 namely, each party must provide a date for the expert’s deposition within three business days of the
18 other party requesting a date; the producing party must make a good faith effort to provide a
19 deposition date that is within two weeks of the request, subject to the expert’s availability;

20 WHEREAS, the Parties have agreed to a modest extension of the class certification briefing
21 schedule, which will not impact the currently scheduled September 20, 2022 hearing.

22 NOW THEREFORE, the Parties stipulate as follows:

- 23 1. The deadline for Google to file an Answer to the Third Amended Complaint is extended
24 from April 1, 2022 to April 8, 2022.
- 25 2. Google shall complete all productions for Search 2 of the Special Master process by
26 April 8, 2022.
- 27 3. The deadline for the exchange of opening expert reports is extended from April 1, 2022
28 to April 15, 2022.

4. The deadline for the exchange of rebuttal expert reports is extended from May 6, 2022 to May 20, 2022.
5. The deadline for the close of expert discovery is extended from June 2, 2022 to August 25, 2022.
6. Each party must provide a date for the expert's deposition within three business days of the other party requesting a date; the producing party must make a good faith effort to provide a deposition date that is within two weeks of the request, subject to the expert's availability.
7. The last day to file a motion for class certification is extended from June 9, 2022 to June 16, 2022. Any opposition shall be due August 4, 2022, and any reply shall be due August 25, 2022.
8. The Parties agree to keep the currently scheduled September 20, 2022 hearing for Plaintiffs' motion for class certification.

DATED: March 28, 2022

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/s/ Stephen A. Broome

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Attorneys for Plaintiffs

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this Stipulation. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: March 28, 2022

By /s/ Amanda Bonn

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

[PROPOSED] ORDER

Judge: Honorable Yvonne Gonzalez Rogers

Pursuant to stipulation of the Parties, the Court revises the case schedule as follows:

Scheduled Event	Current Date	New Date
Google's Answer to Third Amended Complaint	April 1, 2022	April 8, 2022
Google's Deadline to Complete Productions in Response to Search 2 of the Special Master process	N/A	April 8, 2022
Opening Expert Reports	April 1, 2022	April 15, 2022
Rebuttal Expert Reports	May 6, 2022	May 20, 2022
Close of Expert Discovery	June 2, 2022	August 25, 2022
Class Certification Motion	Motion: June 9, 2022 Opp'n: July 28, 2022 Reply: August 25, 2022	Motion: June 16, 2022 Opp'n: August 4, 2022 Reply: No change: August 25, 2022
Class Certification Hearing	September 20, 2022	No change: September 20, 2022

IT IS SO ORDERED.

DATED: _____, 2022

Hon. Yvonne Gonzalez Rogers
United States District Judge